

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Miami Division**

DONALD J. TRUMP,

*Plaintiff,*

v.

MICHAEL D. COHEN,

*Defendant.*

Case No. 23-cv-21377-DPG

**UNOPPOSED MOTION FOR LEAVE TO APPEAR TELEPHONICALLY**

Defendant Michael D. Cohen, by and through undersigned counsel moves on an unopposed basis for leave to allow E. Danya Perry, Esq. to appear telephonically on his behalf at the September 28, 2023, discovery hearing in this matter.

1. On September 19, 2023, the Honorable Chief Magistrate Judge Torres entered an order granting Plaintiff's Amended Motion for Hearing and setting a discovery hearing to occur on September 28, 2023, at the United States Courthouse, 99 N.E. Fourth Street, Tenth Floor, Courtroom Five, Miami, Florida. [D.E. 66.]

2. Defendant's counsel Lilian M. Timmermann, Esq., Benjamin H. Brodsky, Esq., and Max A. Eichenblatt, Esq. will be physically present at the hearing and presenting argument to the Court. Their co-counsel, E. Danya Perry, Esq., is unable to attend in-person and requests leave of Court to appear telephonically at the hearing. Ms. Perry would not be participating in substantive arguments pursuant to the Court's procedures.

3. Defendant has conferred with Plaintiff's counsel and Plaintiff stated no objection to the telephonic appearance.

WHEREFORE, Defendant respectfully requests that the Court enter an Order granting this

Unopposed Motion for Leave to Appear Telephonically and allow E. Danya Perry, Esq. to appear via telephone for the upcoming September 28, 2023, discovery hearing in this matter.

**CERTIFICATE OF GOOD FAITH CONFERRAL**

Pursuant to S.D. Fla. L. R. 7.1(a)(3), undersigned counsel for Defendant certifies that he has conferred with Plaintiff's counsel in a good faith effort to resolve the issues raised herein, and Plaintiff's counsel did not object to the relief sought herein.

Respectfully submitted,

By: /s/ Max A. Eichenblatt  
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*Counsel for Defendant Michael D. Cohen*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this September 27, 2023, a copy of this filing was submitted electronically via the CM/ECF system to all parties that have entered an appearance in this case and on the Court's electronic system.

By: /s/ Max A. Eichenblatt  
Max A. Eichenblatt, Esq.